

1 Honorable Thomas S. Zilly
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IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

10 UNITED STATES OF AMERICA,)
11 Plaintiff,) Case No. 2:16-cv-1041-TSZ
12 v.)
13 DAVID A. GOULD, et al.,)
14 Defendants.)
15 _____)

16
17 The United States hereby submits this status report pursuant to the Court's Order of
18 March 10, 2020 (Dkt. 136). That Order stayed this action to allow for progress on settlement
19 efforts.

20 Counsel for the United States has been communicating with counsel for Defendant Jane
21 Polinder to reach agreement on Ms. Polinder's tax liabilities for the relevant years. This past
22 week, Ms. Polinder submitted additional information, which counsel for the United States and
23 the IRS are reviewing. The United States anticipates that these parties will be able to reach a
24 resolution to the outstanding issues within approximately one month.

1 Dated: March 1, 2022

Respectfully submitted,

2 DAVID HUBBERT
3 Deputy Assistant Attorney General

4 /s/ Charles J. Butler
5 CHARLES J. BUTLER
6 Trial Attorney, Tax Division
7 U.S. Department of Justice
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10 Of Counsel:
11 NICHOLAS W. BROWN
United States Attorney
Western District of Washington

12 *Counsel for the United States of America*

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2 **CERTIFICATE OF SERVICE**
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9 I hereby certify that on March 2, 2022, I filed the foregoing with the Clerk of Court using
10 the CM/ECF system, which will provide electronic notice to all parties that have appeared in this
11 action.
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1 s/ Charles J. Butler
2 CHARLES J. BUTLER
3 Trial Attorney, Tax Division
4 U.S. Department of Justice
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